

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

RECEIVED
BY MAIL

JUN 28 2021

CLERK, U.S. DISTRICT COURT
ST. PAUL, MN

United States of America

Crim NO. 11-CR-386-(MJD)

V

Plaintiff,

SCANNED

Okwuchukwu Emmanuel Jidefor

JUN 29 2021
Rule 45(c)(2)
Fed. R. Civ. P. U.S. DISTRICT COURT ST. PAUL

Defendant

DEFENDANT'S MOTION FOR GOVERNMENT and
Agencies DISCLOSURE produce Records
Compel and a subpoena and For Sanctions

Defendant Okwuchukwu Emmanuel Jidefor moves
the Court for an order requiring the government to
the following information.

The following records and documents, source of information

① Interviews, Proffers, and communications of
with or United States Attorney's office and
Agencies, U.S. Secret Service Agent(s)/Internal Revenue
Service Agent United States Postal Inspection
Agent(s) Immigration Customs and Enforcement Agent
Minnesota Financial Crimes Task Force Agent(s)
Minnesota Department of Public Safety and
Driver's Vehicle Services (DVS) (DEA)
Sheriff's Deputy and mplic Police Departments
Department of Justice Law Enforcement Agency
Federal Prosecuting office, Chief Federal Field manage

② Notes, Reports of Investigations, memoranda, letters, movement/transfer documents, Per diem Financial documents^{or Payments} (including requests, photographs and any audio or video recording Search warrant affidavit any and Surveillance Video, Title III Wiretaps, authorized or utilized in the investigation Concerning Okwuchukwu E Jidoefor (DOB 5/7/1984) From December 9 2009 through February 2014

③ Defendant's motion to compel seeks an order requiring Government and Agencies to produce for his inspection all material identified by the subpoenaing not compel and undercover surveillance, audio^{records} and videotapes of Okwuchukwu E Jidoefor, with Agent

④ to disclosed many as ten proffer interviews with the government.

⑤ To disclosed surveillance in the area foot traffic in the area and locations, cell phone or GPS Agencies were tracking, investigators located.

⑥ To disclosed all data of Okwuchukwu E Jidoefor 5/7/84 any all activity that is databases including but not limited to Federal, State, or local Law.

⑦ To disclosed search warrant affidavits or NCIC arrest, extradition Filed December-2009-2014 any issuing District.

- (8) To disclosure Produce Records Confidential Inf
ormant Review Committee or (CIRC) investigativ informati
relating to electronic Surveillance, Search war
- (9) To disclosure order See 28 C.F.R §§ 16.21-16.29
and Reports or Written Initial Suitability Report and Recomm
dation and (11)(A)(1) (1V)(B)(2) (11)(A)(3)(a)
- (10) To disclosure Produce Records (C1) 10-1301 Dkwuchukwa
Tidefor 5/7/84 Consensual monitored and Recorded undercover
Meeting or authorized, to engage or activity (11)(C)(4)
- (11) To disclosure Produce Records (C1) 10-1301 Dkwuchukwa
Tidefor 5/7/84 Participants in the Witness Security
Program authorization.
- (12) To disclosure Produce Records Probation, Supervise
release official Joic Kyern and Quintin Billingslea
authority or Permission and documented in the
(C1) 10-1301 Dkwuchukwa Tidefor 5/7/84 Files.
- (13) To disclosure Produce Records Communication
With USSS / MNFCTF / From 2014 - 2016
any Federal State, or local Law Enforcement agency
- (15) To disclosure Produce Records engage in any business
or Financial transactions with a (C1) 10-13-01 Dkwuchukwa
Tidefor 5/7/84 authorized, approval of a Field Manager

- (16) All copies record whether Federal, State or local Documentation of Payments receiving sign or initials and date a written receipt - information, services, or expenses. Payment of monies to the (C1) 10-1301 Okwuchukwu Jidoefor 5/7/84 (11) (B) (3) - (5)
- (17) To discovery all the names and addresses of Participants in an act designed to obtain information for the FPD would be unlawful and authorize a (C1) 10-1301 Okwuchukwu Jidoefor and conducted by a law enforcement agent (e.g. breaking and entering, illegal wiretapping, illegal opening or tampering with the mail, or trespass amounting to an illegal search) active.
- (18) To discovery all the (C1) 10-1301 is authorized to engage in Tier 1 or 2 Otherwise Illegal Activity all copies Records Reports Written authorization described above and illegal activity.
- (19) To discovery all (C1) 10-1301 Electronic Surveillance Application and affidavit in support of an application 18 U.S.C § 2516 (11) (D) (1) application and the Court to.
- (20) To discovery all notification of investigation or Prosecution of the (C1) 10-1301 Okwuchukwu Jidoefor 5/7/84

(2) discovery any and all documentary, all statements, obtained Senior Field manager, age JLEA, FPD, (CI) Files.

THE EXHIBITS TO THIS MOTION ARE NUMBERED
STARTING B1 Ending AT B9

Okwuchukwu E. Jidoefor

13880 Business Center Dr
Suite 200
Elk River MN 55330
June 18 2021